

The Honorable John C. Coughenour
The Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT JOHN PRESTON,

Plaintiff,

v.

RYAN BOYER, et al.,

Defendants.

Case No. 2:16-cv-01106-JCC-MAT

STIPULATION AND ~~[PROPOSED]~~
ORDER AMENDING CASE SCHEDULE

NOTING DATE: MAY 13, 2019

STIPULATION

Pursuant to Local Civil Rule 10(g), Plaintiff Robert Preston and Defendants Ryan Boyer and Snohomish County (the “County”) (collectively, the “Parties”) stipulate and agree as follows to modify the November 30, 2018 Pretrial Scheduling Order (Dkt. No. 149) (“Scheduling Order”):

1. In the November 30, 2018 Stipulation, the Parties agreed to set the deadlines for disclosure of affirmative expert reports for April 22, 2019, disclosure of rebuttal expert reports for May 22, 2019, and close of expert discovery for June 12, 2019. The Parties seek to extend the deadline for disclosure of Defendants’ expert Dr. Evan Freedman’s rebuttal report to June 21,

1 2019, and the deadline to depose Drs. Freedman and Brown to July 19, 2019. All other deadlines
2 will remain unchanged.

3 2. Good cause exists for the extension of deadlines. In April 2019, Plaintiffs disclosed
4 their affirmative expert reports, including psychologist Dr. Laura Brown's report. Defendants
5 sought a rebuttal expert to Dr. Brown's report and was able to retain Dr. Evan Freedman.
6 However, due to Dr. Freedman's schedule and some delay in the exchange of documents between
7 Drs. Brown and Freedman, Dr. Freeman is unable to produce a report by May 22, 2019.
8 Moreover, Defendants' counsel has pre-planned extended vacation during this period.
9

10 3. Extension of time for Dr. Freedman to produce his rebuttal report, and for deposition
11 of Drs. Freedman and Brown is not prejudicial because no trial date has been set in this case, the
12 extension is limited to Drs. Freedman and Brown, and it should not affect the remaining schedule,
13 including the dispositive motion deadline.
14

15 4. The Parties stipulate and request that the case schedule be amended as follows:

- 16 a. June 21, 2019: Deadline for disclosure of rebuttal expert Dr. Evan
17 Freedman's report, and
18 b. July 19, 2019: Deadline for close of expert discovery pertaining to Drs.
19 Brown and Freedman.

20 Respectfully submitted this 13th day of May, 2019

21 ADAM CORNELL
22 Snohomish County Prosecuting Attorney

23 By: s/ Marc O. Bides
24 JOSEPH B. GENSTER, WSBA No. 14968
25 MARC O. BIDES, WSBA No. 40496
26 Deputy Prosecuting Attorneys
27 Snohomish County Prosecuting Attorney – Civil Division
3000 Rockefeller Ave., M/S 504
Everett, Washington 98201

1 Phone: (425) 388-6330 / Fax: (425) 388-6333
2 Joseph.Genster@snoco.org
3 MBides@snoco.org

4 *Attorneys for Defendants Ryan Boyer and Snohomish County*

5 By: s/ Christian W. Marcelo
6 Christian W. Marcelo, WSBA #51193
7 Jeffrey M. Hanson, WSBA #34871
8 J. Camille Fisher, WSBA #41809
9 Laura C. Hill, WSBA #49229
10 Heath L. Hyatt, WSBA #54141
11 Perkins Coie LLP
12 1201 Third Avenue, Suite 4900
13 Seattle, WA 98101-3099
14 Tel: 206.359.8000
15 Fax: 206.359.9000
16 JHanson@perkinscoie.com
17 CFisher@perkinscoie.com
18 LHill@perkinscoie.com
19 CMarcelo@perkinscoie.com
20 HHyatt@perkinscoie.com

21 *Attorneys for Plaintiff Robert John Preston*

[PROPOSED] ORDER

Based on the foregoing stipulation and for good cause shown, IT IS SO ORDERED.

The November 30, 2018 Pretrial Scheduling Order (Dkt. No. 149) is modified as follows:

1. The deadline for disclosure of rebuttal expert Dr. Evan Freedman's report is June 21, 2019; and
2. The deadline for close of expert discovery pertaining to Drs. Laura Brown and Evan Freedman is July 19, 2019.

DATED this 14th day of May, 2019



Mary Alice Theiler
United States Magistrate Judge